

ORIGINAL

(23)
5-21-02
SC

Manuel Ramos
Reg. No. 37563-053
U.S. Penitentiary
P.O. Box 7000
Florence, CO. 81226
Petitioner, pro per

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

FILED
HARRISBURG, PA

MAY 20 2002

MARY E. D'ANDREA, CLERK
Per [Signature] Deputy Clerk

Manuel Ramos,
Plaintiff

V.

Margaret Harden,
Dr. McGlori,
Dr. Maximo R. Velasco, JR.
Dr. Anthony Bussanich, and
Dr. Peter J. Terhaar et al,
Defendants

Civil No. 1-CV-00-1957

mag J. Lopez

OBJECTIONS TO INTERROGATORIES/MOTION FOR EXTENSION
OF TIME TO ANSWER-UNTIL AFTER APPOINTMENT OF COUNSEL

NOW COMES Manuel Ramos, Plaintiff herein, who can neither read, write nor speak the English language as he is a native of Colombia, South America who requests that this Court take notice that he has been served, by Defendant Terhaar, a list of 43 Interrogatories containing well over two hundred (200) separate questions and he (Ramos) can not afford an attorney to help him. Ramos requests that this Court take whatever action necessary in the interest of justice.

Under Fed.R.Civ.Proc. Rule 33, Plaintiff must answer or he waives objections. Also, Rule 33 states that the Defendant is limited to: "each party may serve up to 25 interrogatories, including subparts, on each other party." Therefore, Plaintiff Ramos begs this Court's indulgence to nullify the Defendant's Interrogatories or extend the time to answer until Plaintiff can be appointed counsel and has been transferred to the Middle Dist. of Pennsylvania so as to assist Counsel in preparing for trial.

Respectfully submitted under penalty of perjury this 13th day of May in the year 2002. Plaintiff's Signature: M. RAMOS

CERTIFICATE OF SERVICE

I, Manuel Ramos, do certify that a true and correct copy of the foregoing "Objections to Interrogatories/Motion for Extension of Time to Answer-Until Appointment of Counsel" was sent, postage prepaid, to each of the Defendant's listed below on the 14th day of May, 2002.

Plaintiff's signature: Mr. RAMOS

Saba, Endler & Associates, L.L.P.
Attorney for Defendant Peter J Terhaar, D.O.
Suite 100
Park Building
400 THIRD Ave.
Kingston, PA. 18704-5816

The United States and Margaret Harden, Warden (FCI Allenwood, PA)
and Dr. McGlori.
Allenwood FCI, P.O. Box 2500, White Deer, PA., 17887

Dr. Maximo R. Velasco and Dr. Anthony Bussanich, Lewisberg USP,
R.D.#5, Lewisberg, PA., 17837.

Bureau of Prisons, Kathleen Hawk, Director, Central Office, 320
First Street N.W., Washington, D.C. 20534